

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CARRÉ SUTTON, : Docket No.: 1:21-cv-06787 (MKV)  
Plaintiff, :  
-against- : **NOTICE OF MOTION**  
: :  
GÉRALD MARIE, AKA GÉRALD MARIE  
CASTELLAC, an individual, and TRUDI TAPSCOTT, :  
an individual, :  
Defendants. :  
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**PLEASE TAKE NOTICE**, that upon the Declaration of Joseph A. D'Avanzo dated January 19, 2022 and the exhibit incorporated by reference therein and annexed thereto, the accompanying Memorandum of Law, and all of the pleadings and proceedings heretofore had herein incorporated by reference as part of the record, the Defendant, TRUDI TAPSCOTT, will move this Court at the Courthouse located at 500 Pearl Street, Courtroom 18C, New York, New York, before the Hon. Mary Kay Vyskocil, United States District Court Judge, on the 10<sup>th</sup> day of February 2022 at 9:30 in the forenoon, or as soon thereafter as counsel can be heard, for an Order pursuant to FRCP Rule 12 (b) (6) to dismiss the Plaintiff's First Amended Complaint, together with such other and further relief as this Court may deem just, proper and equitable..

Dated: Purchase, New York  
January 19, 2022

Yours, etc.,

PASHMAN STEIN WALDER HAYDEN, P.C.

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Our File No.: 29955.001

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